Exhibit D

```
 1                    J. KANGANIS
 2        Q.    Did you speak with your
 3   attorneys in preparation for this
 4   deposition?
 5             MR. MARTS:  Objection.
 6             Inspector, you can answer the
 7        question, but do not discuss any
 8        attorney/client communications that
 9        we had.
10        A.    Yes.
11        Q.    And who did you speak with?
12        A.    Mr. Marts and another attorney
13   from the Law Department.
14        Q.    Did you meet in person, or did
15   you talk through some other means?
16        A.    We met over Teams.
17        Q.    How many times?
18        A.    Approximately about six.
19        Q.    For approximately how long was
20   each of those meetings?
21        A.    From an hour and a half to two
22   hours.
23        Q.    Was anyone else present for the
24   conversation other than Mr. Marts and the
25   other attorney from the Law Department?
```

Page 17

1   J. KANGANIS
2   A.   Pete Callaghan from PALS was on
3   the call and attorneys from the Law
4   Department.
5   Q.   No one else?
6   A.   That's it.
7   Q.   Have you discussed this
8   deposition with anyone other than those
9   attorneys?
10   A.   No.
11   MS. BULL: I'm going to show
12   our first exhibit which will be
13   marked Kanganis 1.
14   (Whereupon, the aforementioned
15   document was marked as Kanganis
16   Exhibit 1 for identification as of
17   this date by the Reporter.)
18   Q.   Do you see the document on my
19   screen?
20   A.   Yes.
21   Q.   Do you recognize this document?
22   A.   I haven't seen it before, if
23   that's what you are asking.
24   Q.   It says, "Consolidated Notice
25   of Deposition Pursuant to Federal Rule of

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 1                    J. KANGANIS

 2   Civil Procedure 30(b)(6)" at the top;

 3   correct?

 4        A.    Yes.

 5        Q.    And you've never seen it

 6   before?

 7        A.    No.

 8        Q.    Do you understand today that

 9   you are testifying on behalf of the City of

10   New York and the NYPD; correct?

11        A.    Yes.

12        Q.    And you understand that your

13   answers will be binding admissions on the

14   City of New York and the NYPD?

15        A.    Yes.

16        Q.    I'm going to show you topics 20

17   and topics 21 on page 16.

18              Have you seen the content of

19   those two paragraphs before?

20        A.    Yes.

21        Q.    Are those the topics that

22   you've been designated by the City of New

23   York and the NYPD to testify to today?

24        A.    Yes.

25        Q.    Are these the only topics that
```

Page 19

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 1                    J. KANGANIS
 2   you've been designated to testify on?
 3        A.    Yes.
 4        Q.    And are you knowledgeable about
 5   these topics?
 6        A.    Yes.
 7        Q.    What makes you knowledgeable
 8   about topics 20 and 21?
 9             MR. MARTS:  Objection.
10             You can answer.
11        A.    I was the point of contact for
12   the investigations conducted by outside
13   entities into the events of 2020, summer of
14   2020.
15        Q.    And those include the
16   investigations by the Department of
17   Investigation, the Law Department, and the
18   Attorney General's Office?
19        A.    Yes.
20        Q.    Does it include investigations
21   by any local district attorney's office?
22        A.    No.
23        Q.    Did it include the Civilian
24   Complaint Review Board investigations?
25        A.    Yes.
```

Page 20

                    J. KANGANIS
1
2   Q.   What makes you knowledgeable
3   about the NYPD and City of New York's
4   response, coordination, and cooperation
5   with any local district attorney's office?
6   A.   I'm not aware of any
7   investigation by a local district
8   attorney's office into the events that are
9   cited in the screen.
10   Q.   By the events cited in the
11 screen?
12   A.   The summer 2020 protest it
13 says. I was not a point of contact. They
14 had no interaction regarding whatever
15 investigation you are mentioning.
16   Q.   You personally are not aware of
17 any of those investigations you are saying?
18   MR. MARTS: Objection.
19   A.   You mentioned the district
20 attorneys; right? That's what you are
21 mentioning?
22   Q.   Yes.
23   A.   Yeah. I'm not aware of any
24 investigation by the district attorney's
25 office into the police department's

1   J. KANGANIS

2   response to the events in the summer of

3   2020.

4   Q.   But you said before that you

5   were knowledgeable about topic 20; correct?

6   A.   Yes.

7   Q.   Is that yes?

8   A.   Yes.

9   Q.   What makes you knowledgeable

10   about the NYPD and the City of New York's

11   response, coordination, and cooperation

12   with investigations by any local district

13   attorney's office?

14   MR. MARTS: Objection.

15   You can answer.

16   A.   I think I just answered that.

17   I'm not aware of any investigation into the

18   summer 2020 protests by the local district

19   attorney's office.

20   Q.   So you're not knowledgeable

21   about that topic?

22   MR. MARTS: Objection.

23   Asked and answered.

24   MS. BULL: Are you instructing

25   him not to answer?

Page 22

1   J. KANGANIS

2   MR. MARTS: Objection. Asked

3   and answered.

4   MS. BULL: Please answer the

5   question, Deputy Inspector.

6   A.   The answer is I'm not aware of

7   any investigation by any local district

8   attorney's office into the City of New York

9   and the police department's response to the

10 summer 2020 protests.

11   Q.   Did you read or review any

12 materials in preparing to testify today

13 about topics 20 and 21?

14   A.   Yes, I did.

15   Q.   What materials?

16   A.   I read the reports issued by --

17 the preliminary report by your office, the

18 DOI report, the Law Department report, the

19 CCRB report.

20   Q.   Which CCRB report?

21   A.   The one regarding -- I think it

22 was issued in early 2023.

23   Q.   Any other materials?

24   A.   The tracking sheet that I

25 reviewed.

Page 23

1   J. KANGANIS
2   Q.   Was that the tracking sheet
3   related to the Department of Investigations
4   investigation?
5   A.   I believe so.
6   Q.   Any other documents?
7   A.   Confidentiality agreement
8   between the NYPD and DOI.
9   Q.   Has that document been produced
10   in this litigation, to your knowledge?
11   A.   I don't know.
12   MS. BULL: If not, we would
13   call for production of that document.
14   MR. MARTS: Please follow up in
15   writing.
16   We will take it under
17   advisement.
18   Q.   Any other documents that you
19   reviewed in preparation for the deposition
20   today?
21   A.   I reviewed a memo that was
22   written in response to the CCRB report. It
23   was written by Commissioner Talansky.
24   Q.   Was that the NYPD's formal
25   response to the CCRB 2020 report that you

```
 1                    J. KANGANIS

 2   attorney's offices decisions to decline or

 3   dismiss prosecution of protesters?

 4        A.     I read the Vance document that

 5   I spoke about earlier, Officers D'Andraia

 6   and Michael Sher, no e-mails, no

 7   communications regarding declining of

 8   prosecutions of protesters.

 9        Q.     Have you listened to any audio

10   recordings in preparation for the

11   deposition today?

12             MR. MARTS:   Objection.

13             Scope.

14             You can answer.

15        A.     The only video that I watched

16   was de Blasio's video which is at the top

17   of the screen right now.

18        Q.     Have you looked at any

19   photographs in preparation for the

20   deposition?

21             MR. MARTS:   Objection.

22             Form.

23             You can answer.

24        A.     No.

25        Q.     Did you remember anything after
```

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 1                   J. KANGANIS
 2   reviewing these materials that you did not
 3   remember before?
 4             MR. MARTS:  Objection.
 5             You can answer.
 6       A.    I mean it refreshed my
 7   recollection because, you know, it's almost
 8   three years since the events and it's, you
 9   know, it's almost -- it's more than two
10   years since the reports.  So it brought
11   things, you know, to the surface; it helped
12   clarify things.
13       Q.    Anything else that you remember
14   reviewing in preparation for today that you
15   haven't already specified?
16       A.    That's, you know -- I pretty
17   much told you everything that I reviewed
18   that I can remember.
19             MS.  BULL:  Okay, I'm going to
20        stop sharing my screen.
21       Q.    Other than what you've said
22   before, did you speak with anyone other
23   than your attorney in preparation for this
24   deposition?
25             MR. MARTS:  Objection.
```

Page 30

```
 1                    J. KANGANIS
 2            Asked and answered.
 3       A.    The answer is no.
 4       Q.    Was there anyone that you tried
 5  to speak with in preparation for the
 6  deposition who you were unable to speak
 7  with?
 8            MR. MARTS:  Objection.
 9       A.    No.
10       Q.    Did you conduct any other
11  research in preparation for the deposition?
12       A.    No.
13       Q.    Is there any employee of the
14  City of New York who is more knowledgeable
15  about topics 20 or 21 than you are?
16            MR. MARTS:  Objection.
17            You can answer.
18       A.    I don't think so.
19       Q.    Who else might be knowledgeable
20  about these topics?
21            MR. MARTS:  Objection.
22       A.    The only person I can think of
23  would be Inspector Morrow who was the
24  commanding officer during this time.
25       Q.    Commanding officer of --
```

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1   J. KANGANIS

2   A.   No.

3   MR. MARTS: Objection.

4   Please note my objection for

5   the record.

6   Q.   Were you a member of any group

7   chats during that period of the protests in

8   2020?

9   MR. MARTS: Objection.

10   A.   Yes.

11   Q.   In any of those group messages

12   with other NYPD employees, did anyone

13   discuss the Queens district attorney's

14   announcement to not prosecute protest

15   cases?

16   MR. MARTS: Objection to form

17   and scope.

18   A.   I don't remember any such

19   discussions.

20   Q.   So when you said that you're

21   not aware of any complaints from officers,

22   were you saying that you definitively did

23   not know of any complaints from officers or

24   are you just saying you don't recall any

25   complaints from officers?

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 1                    J. KANGANIS
 2              MR. MARTS:  Objection to form
 3         and scope.
 4              You can answer.
 5      A.     I don't remember any complaints
 6   from officers regarding these decisions not
 7   to prosecute.
 8      Q.     And on behalf of the City of
 9   New York, are you able to answer the
10   question definitively that the NYPD did not
11   receive complaints from officers following
12   the announcements by the district attorney
13   offices?
14              MR. MARTS:  Objection to form
15         and scope of the question.
16              You can answer, Inspector.
17      A.     I'm not prepared to answer that
18   question.
19      Q.     In the future, Deputy
20   Inspector, I'm going to ask that if you're
21   not prepared to answer the question or you
22   don't know the answer to the question that
23   you say that instead of answering in the
24   negative.
25              I'm going to show you what will
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 1                    J. KANGANIS
 2   be marked as Kanganis 6.
 3             (Whereupon, the aforementioned
 4        document was marked as Kanganis
 5        Exhibit 6 for identification as of
 6        this date by the Reporter.)
 7             MS. BULL:  Is it has the Bates
 8        stamp DEF_000031229 through 230.
 9        Q.    Do you see the document on my
10   screen that says "finest message" on the
11   top?
12        A.    Yes.
13        Q.    Do you recognize this document?
14        A.    I know what it is.  So I
15   recognize it as to what it is, yes.
16        Q.    Have you seen it before?
17        A.    Well, it's an administrative
18   bulletin.  It probably came across my
19   phone, so I probably did see it before.
20        Q.    I will just let you read the
21   first page.
22             Let me know when you are
23   finished.
24        A.    Okay, I'm done.
25        Q.    Does reading that refresh your
```

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```
 1                   J. KANGANIS

 2   recollection as to whether you've seen this

 3   document before?

 4        A.    No.

 5        Q.    The document is dated June 5,

 6   2020, 19:55; correct?

 7              MR. MARTS:   Objection.

 8              You can answer.

 9        A.    Yeah.   That's the time it was

10   sent out.

11        Q.    So who was involved in the

12   creation of this document?

13              MR. MARTS:   Objection.

14        A.    I'm not prepared to answer who

15   was involved in the preparation of the

16   document.

17        Q.    To whom was this message

18   disseminated?

19        A.    All commands.

20        Q.    Was that disseminated on the

21   same date that it was created?

22        A.    I can't speak to its creation.

23   Sent out June 5, 2020.

24        Q.    What is the source of the

25   information in this document about the
```

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1   J. KANGANIS

2   district attorney's offices?

3   A.   I'm not prepared to answer that

4   question.

5   MR. MARTS: Please note my

6   objection.

7   Q.   The message here specifically

8   says, "despite this announcement, so long

9   as probable cause exists, members of the

10 service will continue to make arrests for

11 unlawful assembly"; correct?

12   A.   That's what it says.

13   MR. MARTS: Objection.

14   You can answer.

15   A.   Yes.

16   Q.   And does that sentence

17 accurately reflect the policy of the NYPD

18 at the time?

19   MR. MARTS: Objection.

20   You can answer.

21   A.   Yes.

22   Q.   Was there any instruction or

23 guidance in this message as to what would

24 constitute probable cause for unlawful

25 assembly?

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```
 1                    J. KANGANIS
 2              MR. MARTS:  Objection to form
 3       and scope.
 4              You can answer.
 5       A.     I think the document speaks for
 6  itself.
 7              So the answer to your question
 8  is no, I don't see any.
 9       Q.     Were there any separate
10  instructions or guidance provided to
11  officers as to what would constitute
12  probable cause for unlawful assembly?
13              MR. MARTS:  Objection to form
14       and scope.
15              You can answer.
16       A.     Not prepared to answer that
17  question.
18       Q.     Is it fair to assume that
19  officers would use documents such as those
20  that we discussed earlier including sample
21  narratives or quick reference guides?
22              MR. MARTS:  Objection to form
23       and scope.
24              You can answer.
25       A.     I'm not prepared to answer that
```

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1   J. KANGANIS

2   question.

3   Q.   So why did the NYPD instruct

4   officers to make arrests that the district

5   attorney offices had said that they'll not

6   prosecute?

7   MR. MARTS: Objection.

8   Objection to form.

9   You can answer.

10   A.   I'm not prepared to answer it.

11   Q.   Wouldn't this instruction that

12   they should continue to make arrests where

13   there is probable cause have the effect of

14   arresting individuals only for them to be

15   released without being charged?

16   MR. MARTS: Objection to form

17   and scope.

18   You can answer.

19   A.   I'm not prepared to answer that

20   question.

21   Q.   And why does the finest message

22   say that we will make arrests for unlawful

23   assembly but it does not say arrest for

24   disorderly conduct?

25   MR. MARTS: Objection to form

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```
 1                    J. KANGANIS
 2       and scope.
 3              You can answer.
 4       A.    I'm not prepared to answer that
 5  question.
 6       Q.    It says in here that the Legal
 7  Bureau Criminal Section is the source of
 8  information for any questions about this
 9  message; right?
10       A.    Correct.
11       Q.    Is that a general phone number
12  for the Legal Bureau?
13       A.    Yes.
14       Q.    Who answers that phone number?
15              MR. MARTS:  Objection.
16              You can answer.
17       A.    An attorney who was on call
18  would answer calls to that number.
19       Q.    Did officers, in fact, contact
20  the Legal Bureau with questions about this
21  finest message?
22              MR. MARTS:  Objection.
23              You can answer.
24       A.    Not prepared to answer.
25       Q.    I'm going to go to page two of
```

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```
 1                   J. KANGANIS
 2    this document.  It says "finest message" at
 3    the top.  Do you recognize this document?
 4         A.      Again, it's a finest message
 5    sent out on the same day, but it looks like
 6    ten minutes earlier than the one we just
 7    discussed.
 8         Q.      Other than the difference in
 9    the time, do you see a difference in this
10    message?
11              MR. MARTS:  Objection.
12              You can answer.
13         A.      The inclusion of disorderly
14    conduct.
15         Q.      In the subject line.
16         A.      Can you go back to the other
17    one because I think -- could you go down a
18    little more?  Is that the first one?
19         Q.      This is the first one.
20         A.      Okay.  Same subject line.
21         Q.      All right.  So there is a
22    different serial number and a different
23    time for this message; right?
24         A.      Correct.
25              MR. MARTS:  Please note my
```

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```
 1                    J. KANGANIS
 2         objection for the record.
 3         Q.     But otherwise, would you agree
 4    there is no difference in the two messages?
 5         A.     Again, can you go back to the
 6    first one?  I didn't memorize the first
 7    one, so --
 8         Q.     We will save time.  I think the
 9    documents speak for themselves.
10         A.     Okay.
11         Q.     How do you explain why there
12    are two separate finest messages saying the
13    same thing?
14         A.     I'm not prepared to answer your
15    question.
16              MR. MARTS:  Please note my
17         objection to form and scope.
18         Q.     You said you're not prepared to
19    answer the question?
20         A.     That's correct.
21         Q.     I'm going to share another
22    exhibit.
23              MR. MARTS:  Just the quick
24         question.  Do you intend to take a
25         break any time soon?
```

1   J. KANGANIS

2   MS. BULL: If you need to take

3   a break, we can take a break.

4   MR. MARTS: What is your plan

5   in terms of lunch?   I just want to

6   figure out the logistics.

7   MS. BULL: Let's go off the

8   record for a second.

9   MR. MARTS: Thank you.   My

10   apologies.

11   MS. BULL: Off the record.

12   (Whereupon, at 11:35 a.m., a

13   short recess was taken.

14   At 11:46 a.m., the deposition

15   resumed.)

16   Q.   Deputy Inspector, just one more

17   question going back to what we were talking

18   about before.

19   In any of the investigations

20   related to the NYPD's response to the 2020

21   protests, did any of those investigations

22   raise the issue of the use of prewritten

23   narratives for arrest reports?

24   MR. MARTS: Objection to form

25   and scope.

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```
 1                    J. KANGANIS
 2              You can answer.
 3         A.    The answer would be I don't
 4   remember that request coming in.
 5              I would have to look at the
 6   tracker to see if there was such a request.
 7   But as I stand right now, unless you have
 8   something to remind me that it did, my
 9   answer would be no.
10         Q.    So you're not prepared to
11   answer that question?
12              MR. MARTS:   Objection.
13         A.    I don't remember the tracker.
14   It's a large document.
15              I'm not to prepared to answer
16   it right now.
17         Q.    But I'm not talking about just
18   one tracker.  I'm talking about all of the
19   investigations that are part of the topic.
20              MR. MARTS:   Objection.
21              Asked and answered.
22              MS. BULL:   Okay.
23         Q.    You're not aware of that issue
24   being raised at all?
25         A.    I'm not prepared to answer the
```

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1   J. KANGANIS

2   question.

3   Q.   I'm going to show you what will

4   be marked Kanganis 7.

5   (Whereupon, the aforementioned

6   document was marked as Kanganis

7   Exhibit 7 for identification as of

8   this date by the Reporter.)

9   Q.   Do you see the e-mail on my

10   screen?

11   A.   Yes, I do.

12   Q.   I'm going to scroll through it.

13   Let me know when you've read it.

14   A.   I have read it.

15   Q.   Do you recognize this document?

16   A.   I recognize it as an e-mail

17   between Chief Hughes and Commissioner

18   Talansky, but I haven't seen it before.

19   Q.   Have you seen the part of the

20   e-mail is forwarding a message from DA?

21   A.   Yes, I see. I mentioned Vance

22   earlier. I've seen a press announcement or

23   article or something. I've seen that

24   before.

25   Q.   So that's the announcement by

Page 100

1   J. KANGANIS

2   the Manhattan district attorney declining

3   to prosecute protest arrests?

4   A.   Yes.

5   Q.   In Steven Hughes' response to

6   that e-mail, he has strong feelings

7   surrounding the announcement?

8   MR. MARTS: Objection to form

9   and scope.

10   You can answer.

11   A.   The e-mail speaks for itself.

12   It wasn't addressed me. I didn't have any

13   conversations with him.

14   Q.   Did any others within the NYPD

15   share his views to your knowledge?

16   MR. MARTS: Objection to form

17   and scope.

18   A.   There were no conversations

19   between me and other members of the police

20   department regarding this decision to, you

21   know, what Talansky states in his press

22   release.

23   Q.   And the Vance announcement is

24   dated June 5, 2020; correct?

25   A.   Yes, e-mail to his staff

```
 1                    J. KANGANIS

 2   apparently.

 3        Q.    In the announcement it says

 4   that the district attorney's office will

 5   decline to prosecute unlawful and

 6   disorderly conduct arrests; correct?

 7             MR. MARTS:  Objection.

 8             You can answer.

 9        A.    I believe that's what it says.

10        Q.    Does NYPD or the City of New

11   York have an understanding as to why the

12   district attorney was not prosecuting those

13   two offenses?

14             MR. MARTS:  Objection.

15             Asked and answered.

16             You can answer.

17        A.    The rationale is in his

18   announcement.  Beyond that, the answer to

19   your question is no.

20        Q.    The announcement also says that

21   the office will evaluate and decline to

22   prosecute other protest-related charges

23   where appropriate; right?

24             MR. MARTS:  Objection.

25             You can answer.
```

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```
 1                    J. KANGANIS
 2        A.    That's what it says.
 3        Q.    And the second paragraph
 4   explains that these offenses undermine the
 5   critical bonds between law enforcement and
 6   communities; right?
 7              MR. MARTS:  Objection.
 8              You can answer.
 9        A.    Yes.
10        Q.    And it specifically mentions,
11   quote, "police violence as a crime",
12   unquote?
13              MR. MARTS:  Objection to form
14         and scope.
15              You can answer.
16        A.    That's what it says.
17        Q.    What was the City of New York's
18   response to this reasoning for the district
19   attorney's decision?
20        A.    I'm not prepared to answer that
21   question.
22        Q.    What is the NYPD's
23   understanding as to whether there are any
24   specific examples of violence that
25   contributed to the district attorney's
```

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1   J. KANGANIS

2   statement and decision?

3   MR. MARTS: Objection.

4   You can answer.

5   A.   I'm not prepared to answer.

6   Q.   Does the NYPD or the City of

7   New York agree or disagree that the

8   prosecution of those offenses undermines

9   critical bonds between law enforcement and

10   communities that they serve?

11   MR. MARTS: Objection.

12   You can answer.

13   A.   Not prepared to answer.

14   Q.   On June 5, 2020, did the NYPD

15   have any security details within the

16   district attorney's offices?

17   MR. MARTS: Objection to form.

18   You can answer.

19   A.   I don't know if on June 5th.

20   I know there were details

21   assigned to Manhattan district attorney's

22   office.

23   Q.   Prior to June 5, 2020, did the

24   NYPD have security details within the

25   district attorney offices?

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1   J. KANGANIS

2   A.   My understanding is yes, they

3   had details assigned to the district

4   attorney offices.

5   Q.   Did the NYPD pull their

6   security details out of the district

7   attorney offices shortly after the

8   announcement that those offices would

9   decline to prosecute certain protest

10   offenses?

11   MR. MARTS: Objection to form.

12   You can answer.

13   A.   At a point in time, the

14   personnel assigned to those details were

15   reassigned to enforcement duties as needed.

16   Q.   So the answer is yes.

17   A.   Can you repeat your question?

18   Q.   Did the NYPD pull their

19   security details out of the district

20   attorney offices shortly after the

21   announcement that they would decline to

22   prosecute certain protest arrests?

23   MR. MARTS: Objection.

24   You can answer.

25   A.   I don't like your

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1   J. KANGANIS

2   characterization pulled. They reassigned

3   the personnel that were assigned to those

4   offices to street -- to other duties.

5   Q.   Who made those decisions?

6   A.   I'm not prepared to answer

7   that.

8   Q.   Why did they make that

9   decision?

10   A.   I can't answer that.

11   Q.   When was that decision made?

12   A.   I don't know the date. I can't

13   tell you the date that it was made.

14   Q.   So you're not prepared to

15   answer that question?

16   MR. MARTS: Objection.

17   A.   The date of the order, no, I'm

18   not prepared to answer that question.

19   Q.   Isn't it true that district

20   attorney offices were only informed mere

21   hours after their public announcement that

22   the details would be reassigned out of

23   their offices?

24   MR. MARTS: Objection.

25   You can answer.

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 1                    J. KANGANIS

 2        A.    I'm not prepared to answer.  I

 3   don't know when they were informed.

 4        Q.    I will show you what will be

 5   Kanganis 8.

 6              (Whereupon, the aforementioned

 7         document was marked as Kanganis

 8         Exhibit 8 for identification as of

 9         this date by the Reporter.)

10              MS. BULL:  This has the Bates

11         stamp DEF_000267108 through 111.

12        Q.    Do you see the document on my

13   screen?

14        A.    Yes.

15        Q.    Have you seen this document

16   before?

17        A.    Yes.

18        Q.    When did you see this document?

19        A.    Recently within the last week.

20        Q.    And it's a New York Times

21   article dated June 15, 2020?

22        A.    Yes.

23        Q.    The first paragraph says, "A

24   few hours after the Manhattan district

25   attorney announced he would not prosecute
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 1                   J. KANGANIS
 2             What is the process for pulling
 3   out requests from the CCRB for other
 4   documents or records from the NYPD?  I am
 5   talking about the time frame of 2020
 6   protests.
 7        A.    Well, there was a CCRB liaison
 8   unit that would produce the documents.
 9   That was not something that came through
10   the Legal Bureau at the time.
11        Q.    Where were they housed within
12   the NYPD?
13        A.    They were housed in Internal
14   Affairs Bureau at the time.
15        Q.    You said, "at the time."  Has
16   that changed since then?
17        A.    I don't know it to be
18   different.
19        Q.    You're not really prepared to
20   answer that question though?
21             MR. MARTS:  Objection.
22        A.    I think I just answered it, but
23   I mean I said they were in IAB when they
24   were going on.  If you are saying where are
25   they right now, I can't -- I'm not prepared
```

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1   J. KANGANIS

2   to answer that question.

3   Q.   How many people were in the

4   CCRB Liaison Unit within IAB?

5   A.   I don't know.

6   Q.   Was there any time frame by

7   which they had to fulfill requests for

8   documents or records?

9   A.   Not prepared to answer. Not my

10 unit.

11   Q.   Did the NYPD members have any

12 obligation regarding CCRB investigations?

13   MS. BULL: Objection.

14   A.   Our obligation is to cooperate

15 with the CCRB investigations and get them

16 what they need in a timely manner; if they

17 need to speak to the witnesses, notify the

18 witnesses so they can complete

19 investigations.

20   Q.   Were members of service

21 required to comply with requests to be

22 interviewed?

23   A.   They were notified to be

24 interviewed if CCRB requested them. Were

25 they required is that -- yeah, they are

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1   J. KANGANIS

2   required to report to CCRB. And that's the

3   question directly to their duties, yeah.

4   Q.   What happens if someone refused

5   to comply with an interview?

6   MR. MARTS: Objection.

7   You can answer.

8   A.   I don't remember the number of

9   the interim order or the order that they

10   have in their favor, but they can compel

11   testimony. And if you refuse to answer,

12   there is serious consequences up to and

13   including termination is my understanding.

14   Q.   When you say, "they," are you

15   saying NYPD can compel testimony?

16   A.   CCRB can compel testimony.

17   Q.   So would NYPD do anything to

18   ensure that members of service complied

19   with CCRB?

20   A.   We would make notifications to

21   the individual officers that they are to

22   report to a certain location, CCRB wants to

23   interview them.

24   Q.   But if they refuse to comply,

25   it would be up to CCRB to compel that

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 1                    J. KANGANIS
 2        A.      Like a sealed record.   If
 3   somebody is, you know, somebody's case is
 4   sealed, we need a waiver to share the
 5   footage.   If somebody is a juvenile, we
 6   need a waiver to share that footage.   Those
 7   are the two most prevalent situations or
 8   examples.
 9        Q.      Who would need to provide the
10   waiver?
11        A.      CCRB would have to get it from
12   the complainant and give it to us.
13        Q.      So how would they get a verbal
14   waiver?
15        A.      Over the phone.
16             MR. MARTS:   Objection.
17             Outside the scope.
18             You can answer.
19        A.      At the time they were given
20   over the phone, and on the good-faith
21   representation we accepted those
22   representations from the CCRB.
23        Q.      Who made the decision to accept
24   verbal waivers?
25        A.      I made that decision.
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1   J. KANGANIS
2   Q.   Why did you make that decision?
3   A.   Because we had a good
4   relationship with CCRB. We had an open
5   dialogue, and we were working very well
6   together.
7   And that's what they needed to
8   get their job done, so that's what we did.
9   Q.   Any of the procedures that we
10   just talked about, did any of those
11   procedures change after the 2020 protest
12   period?
13   A.   There is -- there was a new
14   body-worn camera Patrol Guide procedure in
15   2020, but I don't know if they
16   incorporated.
17   I believe the verbal waiver
18   still exists, but I'm not certain of that
19   so I can't testify to the fact that it's
20   still in existence. I believe it is, but
21   I'm not prepared to say for sure.
22   Q.   What was the change; did you
23   says body-worn camera Patrol Guide?
24   A.   Yes, Patrol Guide procedure was
25   expanded. I'm not familiar with the

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1   J. KANGANIS

2   procedure. I can't even give you the

3   number. But it is in the Patrol Guide, and

4   I know it was changed in 2020.

5   Q.   I'm going to show you what will

6   be marked Kanganis 12.

7   (Whereupon, the aforementioned

8   document was marked as Kanganis

9   Exhibit 12 for identification as of

10   this date by the Reporter.)

11   MS. BULL: It has the Bates

12   stamp DEF_000175466 through 468.

13   Q.   Do you see the document that

14   says, "Investigations by Civilian Complaint

15   Review Board" on the top?

16   A.   Yes.

17   Q.   Do you recognize this document?

18   A.   Well, I recognize it to be a

19   Patrol Guide procedure.

20   Q.   Have you seen that before?

21   A.   I don't remember seeing it.

22   I've seen almost every Patrol Guide

23   procedure, but -- I'm sure I've seen it

24   before; I just don't remember what is in

25   it.

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1   J. KANGANIS

2   Q.   It says it's issued July 1,

3   2020; right?

4   A.   Yes.

5   Q.   Does that mean that this is a

6   new section or procedure in the Patrol

7   Guide that wasn't in place before July 1,

8   2020?

9   MR. MARTS: Objection.

10   A.   This particular procedure may

11   have been in existence prior to that, but

12   there is some change.   There may be some

13   change in it that wasn't reflected in the

14   prior procedure.

15   Q.   Was this section of the Patrol

16   Guide in place before July 1, 2020?

17   A.   I can't say for sure, so I'm

18   not prepared to answer your question.   I

19   believe it was, but I can't say for sure.

20   MS. BULL: Well, if it was, we

21   will call for the production of that

22   section of the Patrol Guide.

23   MR. MARTS: We ask that you

24   follow up in writing.

25   And we will take it under

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 1                     J. KANGANIS
 2        advisement.  Thank you.
 3        Q.      What precipitated any revision
 4   or creation of the Patrol Guide?
 5        A.      I'm not prepared to answer.
 6        Q.      Who made the decision to make
 7   any revisions to the patrol guide?
 8        A.      I'm not prepared to answer the
 9   question.
10        Q.      Since July 1, 2020, has there
11   been any change to this procedure?
12        A.      I'm not prepared to give you an
13   answer to that question.
14        Q.      Does it seem important to you
15   that if you are going to be designated to
16   answer questions about CCRB investigations
17   to know the part of the Patrol Guide called
18   "Investigations by Civilian Complaint
19   Review Board"?
20             MR. MARTS:  Objection to the
21        form of the question.
22        A.      In 2021, my understanding was
23   you were going to ask me about the process
24   in June of 2020 and that time frame, and
25   I'm very prepared to speak about that.
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 1                     J. KANGANIS
 2              MR. MARTS:  Please note my
 3         objection to the record.
 4              MS. BULL:  Off the record.
 5              (Whereupon, at 1:44 p.m., a
 6         short break was taken.
 7              At 1:53 p.m., the deposition
 8         resumed.)
 9              MS. BULL:  Just for the record,
10         I'm going to ask Janna if you could
11         read back the part of Deputy
12         Inspector's answer where he said he
13         was not a member of the agency at the
14         time.
15              (Whereupon, the referred to
16         answer was read back by the
17         Reporter.)
18        Q.    Do you have anything you want
19    to change or add to that response?
20        A.    I will add the following.
21              My recollection is that the
22    department's position was the way that CCRB
23    calculated the number of officers was
24    inaccurate.  They double counted to make
25    the count appear higher than it actually
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1   J. KANGANIS

2   was.

3   And the second thing I recall

4   an inaccuracy, the disposition, the

5   investigation of the sub -- the

6   substantiation by the CCRB after an

7   investigation is not a final disposition

8   until the -- if there is a hearing, a

9   finding and the police commissioner makes a

10   final determination on that incident.

11   So that's where I point to

12   inaccuracies.

13   Q.   To confirm, despite the fact

14   that you're retired, you consented to speak

15   on behalf of the City of New York today;

16   correct?

17   A.   Yes.

18   Q.   And the CCRB is an entity

19   within the City of New York; correct?

20   A.   Yes.

21   Q.   And the memo that you're

22   talking about that was signed by Carrie

23   Talansky, who contributed to that memo?

24   A.   I'm not prepared to answer that

25   question.

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1   J. KANGANIS

2   Q.   Who directed that memo to be

3   written?

4   A.   I can't answer that question.

5   Q.   And is it the City of New

6   York's position that the CCRB issued an

7   inaccurate report?

8   A.   Yes.

9   MR. MARTS: Please note my

10   objection for the record.

11   Q.   What was the process of putting

12   together that memo by Talansky?

13   A.   I'm not prepared to answer

14   that.

15   Q.   What, if anything, did you do

16   to prepare answers related to questions

17   about the memo signed by Carrie Talansky?

18   A.   I read the memo.

19   My understanding was it was in

20   evidence, but apparently it's not, so...

21   Q.   Anything else?

22   A.   That's it.

23   Q.   Is it your testimony that the

24   number that was reported by the CCRB is

25   inaccurate or a mischaracterization of the

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 1                     J. KANGANIS

 2    number of substantiation?

 3              MR. MARTS:   Objection to the

 4        form of the question.

 5              You can answer.

 6       A.      I believe it's inaccurate.   But

 7    what was your alternative answer?

 8       Q.      Well, sorry, I'm trying to pull

 9    up -- is there any other disagreement that

10    the NYPD had with the findings of the

11    report other than what is contained in the

12    memo signed by Talansky?

13              MR. MARTS:   Objection to the

14        form.

15              You can answer.

16       A.      That memo by Commissioner

17    Talansky is the response to the report.

18       Q.      That's not responsive to my

19    question.

20       A.      The question was is there

21    additional beyond outside the memo; was

22    that your question?

23       Q.      Yes.

24       A.      No.

25       Q.      I'm going to share Kanganis 13.
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1   J. KANGANIS

2   This is the CCRB 2020 report. I'm looking

3   at footnote four.

4   Is this the part of the report

5   that you are referring to that was

6   mentioned in the memo as reflected the

7   inaccurate number?

8   A.   Yes.

9   Q.   And the CCRB here says that if

10   a member of service has substantiated

11   misconduct in more than one complaint they

12   are counted more than once so the total

13   number of members of service was

14   substantiated disorderly misconduct?

15   A.   Yes.

16   MR. MARTS: Note my objection.

17   A.   Yes.

18   Q.   So you are saying that because

19   six members of service had several CCRB

20   complaints that were substantiated, that

21   over counts the number of individuals who

22   had substantiated complaints?

23   A.   Yes.

24   MR. MARTS: Objection.

25   Q.   But doesn't the CCRB state in

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1   J. KANGANIS

2   asked for.

3   Q.   Let's go back to Kanganis 18

4   which is a DOI report, page 24 ending in

5   Bates stamp 237.

6   Do you see this chart that

7   says, "four sources of NYPD arrest data for

8   Floyd protests"?

9   A.   Yes.

10   Q.   Is it accurate that these four

11   sources, MAPC, joint operations, intel

12   SITREPS, and NYPD spreadsheet are the four

13   sources for arrest data from the NYPD?

14   A.   I think that's the four sources

15   that we gave them. I'm not aware of any

16   others.

17   Q.   At the time DOI made the

18   request, did you investigate whether there

19   were any other sources of data?

20   A.   We didn't do any investigation.

21   We went to where we could get the data for

22   them. These were the logical locations.

23   We might have requested, you

24   know, something from MAPC and it was taking

25   too long. So we might have called somebody

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 1                    J. KANGANIS

 2   we knew in joint operations.

 3             We were just trying to get them

 4   the information as quickly as possible.

 5        Q.    Can you explain what each of

 6   these sources are?

 7        A.    Well, I can explain the first

 8   two.  MAPC is what I mentioned earlier.

 9   They are, you know, when we have arrest

10   processing, Criminal Justice Bureau

11   maintains the identity of those arrested.

12   I mentioned operations.  That would be, you

13   know, the calls into the data.  They would

14   call data regarding not only deployments,

15   but arrests made.  The intel SITREPS, I

16   think those are intelligence division

17   situation reports which may have been in

18   the prior slide and this NYPD spreadsheet,

19   I don't know the basis of it.  It's too

20   broad to identify.

21        Q.    You don't know what NYPD

22   spreadsheet --

23        A.    I don't know what the source of

24   it is.

25        Q.    Do you know what the document
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1   J. KANGANIS

2   is?

3   A.   No.   I'm not prepared to answer

4   that.

5   Q.   How do you explain the

6   discrepancies in the data collected by

7   these different reports as shown in the

8   chart?

9   A.   Well, I can't answer.

10   I'm not prepared to answer

11   that.

12   Q.   But you remember the part of

13   the report I'm talking about where it

14   discusses where there is discrepancy?

15   A.   Yes, yes.

16   I can't explain to you why one

17   says 75, one says 73 other than the obvious

18   situation that was in existence during

19   these dates and something didn't get done

20   as it was supposed to because in theory

21   everything should have been consistent.

22   Q.   Does the City of New York

23   consider a problem that there are

24   discrepancies in the numbers from these

25   different reports?

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1   J. KANGANIS

2   MR. MARTS: Objection.

3   A.   Yes.

4   Q.   And what, if anything, has the

5   NYPD done to prove their data collection

6   practices to address this issue?

7   A.   We accepted the recommendation

8   of the DOI report, and we implemented it.

9   Q.   What specific recommendations

10   did you implement that addressed this

11   specific issue?

12   A.   I have to see the

13   recommendations again.

14   Q.   We will get back to that.

15   Anything that's not contained

16   in this recommendation that NYPD did to

17   implement --

18   A.   Not prepared to answer.

19   Q.   So you don't have independent

20   knowledge of what the City implemented to

21   address this issue?

22   A.   No.

23   MR. MARTS: Objection.

24   Q.   Going to page nine of the

25   report ending in the Bates stamp 222. I'm

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 1                    J. KANGANIS
 2   going to refer you to footnote seven
 3   starting with there is some ambiguity.
 4        A.    Yes.
 5        Q.    It says, "DOI sought
 6   clarification from NYPD as to the ambiguity
 7   in the system for inputting racial data";
 8   is that correct?
 9        A.    That's correct.
10        Q.    Can you explain the ambiguity
11   in the system?
12        A.    They are explaining it here.
13   They wanted to have a more accurate count
14   about Latino arrestees apparently as they
15   describe it.
16        Q.    Is it accurate that NYPD was
17   unable to resolve that uncertainty?
18        A.    Yes, it's accurate.
19        Q.    Why were they unable to?
20        A.    Because we didn't keep the data
21   in the way that they were asking for it.
22        Q.    Has NYPD done anything since to
23   change their data practices with respect to
24   collecting information about race?
25        A.    Not prepared to answer other
```

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1   J. KANGANIS

2   than to say whatever recommendations were

3   made we accepted them all.

4   Q.   So you don't have any

5   independent knowledge of what was

6   implemented to address this issue?

7   A.   Correct.

8   MR. MARTS: Please note my

9   objection for the record.

10   Q.   Does the NYPD consider or does

11   the City of New York consider it important

12   to collect accurate data about racial

13   breakdown of arrests?

14   A.   Yes.

15   MR. MARTS: Note my objection.

16   A.   Yes.

17   Q.   I'm going to page ten in the

18   report, footnote nine. I will go down to

19   the next page. Read these two sentences,

20   and let me know when you are ready for me

21   to scroll down.

22   A.   I'm ready.

23   Q.   This is the rest of the

24   footnote. This says, "DOI found divergent

25   numbers regarding the breakdown of the

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 1                    J. KANGANIS
 2   total number of officers injured at
 3   protests"; correct?
 4        A.    Yes.
 5        Q.    Why is that?
 6        A.    Well, medical division is the
 7   source they used, and that is the most
 8   reliable source.  I don't know what their
 9   other source was.
10              They also received TRI reports
11   which are supposed to be done when an
12   officer is injured.  So it could be the
13   reports were not done in every instance.
14   They should have been --
15        Q.    When you say TRI, for the
16   record, do you mean T-R-I?
17        A.    Yes, T-R-I.
18        Q.    What data is maintained in the
19   medical division record --
20              MR. MARTS:  Objection.
21        Q.    -- related to officer injuries?
22        A.    Well, medical division is
23   notified of line-of-duty injuries.
24        Q.    This was a new record produced,
25   and you're not able to answer what other
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 1                    J. KANGANIS
 2   record was produced related to data about
 3   officer injury to the DOI?
 4        A.    Well, TRI report, they were
 5   also produced.  That could be the
 6   discrepancy.
 7        Q.    Those were the two sources of
 8   information?
 9        A.    That I recall.
10        Q.    How do you explain the
11   discrepancy between those two sources of
12   data?
13             MR. MARTS:  Objection.
14             Asked and answered.
15        A.    As I said, the TRI report may
16   not have been done considering the
17   situations in the field on these dates.  So
18   that's my explanation.
19        Q.    So they provide information to
20   the medical division that not necessarily
21   created a TRI report?
22        A.    Yes.
23        Q.    Why do you say that the medical
24   division records are the most reliable?
25        A.    Well, because every injury is
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1   J. KANGANIS

2   to be called into them in addition to a

3   report being done, but they -- they would

4   have received notice of officer injuries.

5   Q.   Who gives notice to the medical

6   division about the injury?

7   A.   It could be the police officer,

8   could be the supervisor.

9   MR. MARTS: Please note my

10   objection.

11   Outside of scope.

12   Q.   Did NYPD do anything to ensure

13   that any officer injury that's reported to

14   the medical division is also reflected in a

15   TRI report?

16   A.   I'm not prepared to answer

17   that.

18   Q.   The DOI report also says that

19   records do not reliably capture the number

20   of injuries sustained by the protestors;

21   correct?

22   A.   Yes.

23   Q.   How does the NYPD collect data

24   on injuries reported by protesters?

25   MR. MARTS: Objection.

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1   J. KANGANIS

2   Outside of the scope.

3   A.   They'll tell you the TRI

4 report.   It's a two-way street, records the

5 officers injuries and an injury to a

6 civilian.

7   Q.   Any other place where that

8 would be recorded?

9   A.   An aided report which is

10 anytime somebody is injured, not

11 necessarily as a result of police action,

12 would be recorded on there.

13   Q.   And if a civilian reports to a

14 police officer or mentions that they are

15 injured, is an officer required to put that

16 information in a TRI report?

17   MR. MARTS: Objection.

18   Outside of the scope.

19   You can answer.

20   A.   Not prepared to answer.

21   Q.   I'm going to talk about the

22 last category of information that I

23 mentioned before which is interviews.

24   Are you aware of any documents

25 that list every individual that the

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1   J. KANGANIS

2   Department of Investigation interviewed in

3   the course of their investigation?

4   A.   A document that lists every --

5   no, I'm not aware.

6   Q.   Do you have the information of

7   what individuals employed by the City of

8   New York were interviewed by the DOI?

9   MR. MARTS: Objection.

10   A.   I do not have it with me.

11   Q.   Do you have it somewhere?

12   A.   I know that some people,

13   high-level people were interviewed.

14   I don't have a list of all

15   people interviewed anywhere.

16   Q.   Was that record maintained by

17   anybody?

18   A.   I can't answer that. I'm not

19   prepared to answer that.

20   If they made a request for

21   interviews, we recorded the request for

22   interviews and we went about securing the

23   notification. And they worked out the

24   specifics of when and where that person

25   would be interviewed.

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 1                    J. KANGANIS

 2        Q.    Is there anyone who DOI

 3   requested to interview from the NYPD who

 4   they were unable to interview?

 5        A.    Yeah.  Chief Pichardo.

 6        Q.    And why were they unable to

 7   interview him?

 8        A.    He had retired, and he was no

 9   longer in New York.

10        Q.    And did he decline the

11   interview?

12             MR. MARTS:  Objection.

13        A.    Not prepared to answer.

14             An alternate person from that

15   command was provided or offered.

16        Q.    Do you understand that he has

17   made himself available to be deposed in

18   this litigation?

19             MR. MARTS:  Objection.

20             You can answer.

21        A.    Not prepared to answer.

22        Q.    Did the City of New York desire

23   to interview Chief Pichardo at the time DOI

24   was investigating?

25             MR. MARTS:  Can you repeat the
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 1                    J. KANGANIS

 2        question?

 3              MS. BULL:  Did the City desire

 4        to interview Chief Pichardo at the

 5        time of this investigation.

 6              MR. MARTS:  Are you speaking

 7        about DOI?

 8              MS. BULL:  I'm saying the City

 9        of New York.

10        Q.    But at the time that this

11   request was made.

12        A.    DOI made the request.  I'm not

13   aware of any other request to interview.

14        Q.    Did at any point the City of

15   New York attempt to interview Chief

16   Pichardo in connection with the 2020

17   protests?

18              MR. MARTS:  Objection.

19        A.    Not prepared to answer.

20        Q.    Was there anyone else who DOI

21   requested to interview but did not?

22        A.    Pichardo is the one that I know

23   they requested and did not interview.

24   Other than him, I'm not aware of anybody

25   else.
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 1                   J. KANGANIS
 2       Q.     The Law Department also
 3   completed their report reviewing the
 4   protests as directed by the Executive
 5   Order; correct?
 6       A.     Yes.
 7       Q.     What, if anything, was
 8   different in the document information and
 9   witnesses reviewed by the Law Department
10   from what was reviewed by the DOI?
11               MR. MARTS:  Objection.
12               You can answer.
13       A.     Well, the Law Department, DOI
14   gave the documents we provided to them
15   including the interviews to the Law
16   Department.  The Law Department focus was
17   more on the officer health and safety and
18   historical perspective regarding the NYPD's
19   response to prior large-scale protests.
20       Q.     Did the Law Department conduct
21   any interview of any members of the NYPD
22   separate from the interviews conducted by
23   the DOI?
24               MR. MARTS:  Objection to form.
25               I couldn't hear you.
```

1   J. KANGANIS

2   Q.   Did the Law Department conduct

3   any interviews of any members of the NYPD

4   separate from the interviews conducted by

5   the DOI?

6   MR. MARTS: Objection to the

7   form of the question.

8   A.   I don't recall any interviews

9   other than DOI investigators sharing their

10   interviews with high-level NYPD members

11   with the Law Department.

12   So the answer to your question

13   is no unless you can refresh my

14   recollection.

15   Q.   I'm going to show you what will

16   be Kanganis 19.

17   (Whereupon, the aforementioned

18   document was marked as Kanganis

19   Exhibit 19 for identification as of

20   this date by the Reporter.)

21   MS. BULL: This has the Bates

22   stamp SOW001641 through 1695.

23   Q.   Do you recognize this document?

24   A.   Yes. That's the Law Department

25   report.

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1   J. KANGANIS

2   Q.   Page nine -- sorry.

3   A.   That's all right.

4   Q.   It says at the very end, "The

5   Law Department also reviewed DOI

6   interviewees with NYPD officers in this

7   report. All references to discussions with

8   NYPD are references to DOI's interviewees

9   with NYPD except where specified that it

10 was a Law Department interviewee."

11   A.   Do they mean interviewees with

12 the NYPD or one of their people outside the

13 NYPD because I'm not aware of any

14 interviews other than the DOI interviewees?

15   Q.   I read this sentence to mean

16 that there were Law Department interviewees

17 separate from DOI. Can you answer whether

18 there were any such interviewees?

19   A.   Again, I'm going to say no. I

20 think they are referring to Professor

21 McGuire and all these other academics that

22 they went and spoke to.

23   Q.   Are you aware of any documents

24 listing who the Law Department interviewed

25 in connection with this report?

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1   J. KANGANIS

2   MR. MARTS: Objection.

3   Outside of the scope.

4   A.   No.

5   Q.   How did the Law Department and

6   DOI coordinate in creation of their

7   reports?

8   MR. MARTS: Objection.

9   A.   Not prepared to answer.

10   MS. BULL: Can we take a

11   five-minute break?

12   (Whereupon, 4:01 p.m., a short

13   break was taken.

14   (At 4:10 p.m., the deposition

15   resumed.)

16   Q.   What was the NYPD's response to

17   the published DOI and Law Department

18   reports?

19   A.   We accepted the findings and

20   implemented the recommendations.

21   Q.   Was that also the City of New

22   York's response?

23   A.   Yes.

24   Q.   Did Mayor de Blasio make any

25   public statements about the DOI report

Page 246

1   J. KANGANIS

2   after it was completed?

3   A.   I saw that video. Is that what

4   you are referring to?

5   Q.   Yes, if that's a public

6   statement. Are you aware of any other

7   public statements?

8   A.   No, I'm not.

9   Q.   Did he make that statement

10   shortly after the release of the district

11   attorney report?

12   A.   I believe he did. I'm not

13   certain of the date; but the way he was

14   speaking, it was around the same time.

15   Q.   And in that statement, is it

16   correct that Mayor de Blasio stated that

17   both he and Commissioner Shea agree with

18   the report's analysis and recommendations?

19   A.   Yes.

20   Q.   And that they both agreed to

21   implement the recommendations right away?

22   A.   Yes.

23   Q.   Is that what he said?

24   A.   Yes. I'm sorry, I said yes.

25   Q.   Mayor de Blasio also said that

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 1                    J. KANGANIS

 2   he had remorse about what happened in the

 3   protests in May and June and wishes he had

 4   done better; correct?

 5        A.     Correct.

 6               MR. MARTS:  Objection.

 7               You can answer.

 8        A.     Yes, that's what he said.

 9        Q.     Do you know what he meant by

10   that exactly?

11               MR. MARTS:  Objection.

12        A.     No.  I can't -- I don't have

13   any basis to answer that.

14        Q.     Who would we need to talk to to

15   determine what he meant?

16               MR. MARTS:  Objection.

17               You can answer.

18        A.     I think it's pretty clear what

19   he said and what he meant by the words he

20   used.

21        Q.     I thought --

22        A.     I don't have a name for you.

23        Q.     Would we have to talk to Mayor

24   de Blasio to know what he meant?

25               MR. MARTS:  Objection.
```

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1   J. KANGANIS

2   A.   I'm not prepared to answer

3   that.

4   Q.   You are also not prepared to

5   answer what he meant; correct?

6   A.   I understood what he said. It

7   was pretty clear to me.

8   Q.   So what was he looking back on

9   with remorse?

10   MR. MARTS: Objection.

11   You can answer.

12   A.   Decisions he made as the head

13   of the City.

14   Q.   Which decisions?

15   A.   Not prepared to answer.

16   Q.   Who could answer that?

17   MR. MARTS: Objection.

18   A.   I think I answered that. I

19   can't tell you. I'm not prepared to

20   answer. de Blasio made a statement. It

21   seems pretty clear. I can't interpret it

22   for you. I don't know who can.

23   Q.   Could Mayor de Blasio answer

24   what decisions he was looking back on with

25   remorse?

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 1                    J. KANGANIS
 2              MR. MARTS:  Objection.
 3              That's speculation.
 4      A.      I'm not prepared to answer your
 5   question about Mayor de Blasio.
 6      Q.      What has the City and NYPD done
 7   to implement the recommendations of the DOI
 8   and Corporation Counsel reports?
 9      A.      A team was put together of
10   different representatives from different
11   bureaus.  And they went through the
12   recommendations, and they took action on
13   all.
14              But I think the last time I
15   looked one was still pending, putting in
16   the plan to consolidate commission to
17   combat police corruption and Inspector
18   General taking it out of DOI and putting it
19   under CCRB.
20      Q.      Who made the decision that the
21   City would accept and implement those
22   recommendations?
23      A.      For the NYPD, it was
24   Commissioner Shea.
25      Q.      And for the City of New York?
```

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1   J. KANGANIS

2   A.   Mayor de Blasio.

3   Q.   And who was part of the team

4   that you said was implementing the

5   recommendations?

6   A.   I don't have identities. I can

7   tell you there was a team of

8   representatives from Strategic Initiatives

9   Bureau, the Legal Bureau, and different

10   commands that were specific to particular

11   recommendations. If it was training, it

12   would be Training Bureau representative, et

13   cetera.

14   Q.   Are you prepared to answer

15   exactly who was part of the team?

16   A.   No, I'm not prepared to answer.

17   MR. MARTS: Please note my

18   objection for the record.

19   Asked and answered.

20   Q.   I'm going to show you what will

21   be marked Kanganis 20.

22   (Whereupon, the aforementioned

23   document was marked as Kanganis

24   Exhibit 20 for identification as of

25   this date by the Reporter.)

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1   J. KANGANIS

2   Q.   It says, "Mass Demonstrations

3   Response Recommendations Tracker" on the

4   top; is that right?

5   A.   Correct.

6   MS. BULL: I will just say for

7   the record that this is the document

8   that was publicly available on the

9   NYPD website.

10   Q.   Is this the tracker document

11 that you've referenced before in this

12 testimony?

13   A.   Yes, it is.

14   Q.   Does this contain all of the

15 recommendations from the DOI and Law

16 Department reports?

17   A.   It's supposed to.

18   I see you have one of four. If

19 it's the complete document, then yes, it

20 does.

21   Q.   Who was responsible for writing

22 this document?

23   A.   Not prepared to answer.

24   Q.   Does this document accurately

25 describe all the steps that NYPD has taken

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 1                    J. KANGANIS
 2   to implement the reports recommendations?
 3        A.     Yes.
 4        Q.     And the date of this document
 5   is December 22, 2021; correct?
 6        A.     Correct.
 7        Q.     Does this reflect the final
 8   version of this tracking document?
 9        A.     I'm not prepared to answer
10   that.
11        Q.     As you said before, every
12   column says complete as status.  I think
13   you said that 21A is the only one that says
14   in progress; is that what you meant before?
15        A.     Yes.
16             MR. MARTS:  My apologies.
17          Could you zoom in a little bit
18           because the font is really small and
19           I'm having difficulty?
20        Q.     When I ask you a specific
21   question, I will zoom in.
22             MR. MARTS:  Thank you.
23        Q.     Were the DOI and Law Department
24   consulted in the implementation of the
25   recommendations?
```

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1   J. KANGANIS

2   Q.   But your answer said they

3   didn't always. Did they ever?

4   A.   If they had a conversation with

5   them, we might ask them why they needed

6   something. But, you know, I'm -- I can't

7   say it was -- did they ever? Yes, they

8   did. But I can't recall specifically an

9   incident where they did.

10   Q.   Did any request for

11   documentations about any specific

12   complaints they had received trigger any

13   action by the NYPD?

14   MR. MARTS: Objection.

15   You can answer.

16   A.   I don't understand the question

17   really. What --

18   Q.   Did the NYPD open any internal

19   investigations into complaints that they

20   learned about through conversations with

21   the OAG?

22   MR. MARTS: Objection.

23   A.   Not prepared to answer.

24   MR. MARTS: My apologies. Just

25   for the record, object to the scope.

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```
 1                    J. KANGANIS
 2        A.     Not prepared to answer.
 3        Q.     Attorney General James also
 4   called public hearings during the course of
 5   her investigation; right?
 6        A.     Yes.
 7        Q.     On this June 17th, 18th, and
 8   22nd?
 9        A.     If those were the dates, I
10   don't know; but yes.
11        Q.     And the hearing was
12   live-streamed?
13        A.     Yes.
14        Q.     What, if anything, did the City
15   of New York do to track what was said
16   during the hearings?
17               MR. MARTS:  Objection.
18               Outside of the scope.
19        A.     I'm not prepared to answer
20   that.
21        Q.     I'm going to show you what will
22   be marked Kanganis 24.  It has Bates stamp
23   DEF_E_PD_ 00073644 through 645.
24               (Whereupon, the aforementioned
25        document was marked as Kanganis
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```
 1                    J. KANGANIS
 2       Exhibit 24 for identification as of
 3          this date by the Reporter.)
 4       Q.    I'm going to give you a chance
 5   to look at this.  Let me know when you are
 6   ready.
 7       A.    Okay, I have read it.
 8       Q.    Have you seen this before?
 9       A.    No.
10       Q.    It appears to be an e-mail from
11   Oleg Chernyavsky --
12       A.    Yes.
13       Q.    -- dated June 19, 2020; right?
14       A.    Yes.
15       Q.    And it is addressed to
16   Commissioner Shea among other executives?
17       A.    Yes.
18       Q.    It summarizes the issues that
19   were raised during the AG's hearings?
20       A.    Yes.
21       Q.    What was the purpose of this
22   summary?
23       A.    Not prepared to answer.
24       Q.    What, if anything, was done in
25   response to the information that was
```

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1   J. KANGANIS

2   collected?

3   A.   Again, I'm not prepared to

4   answer.

5   This is the first time I'm

6   seeing this.

7   Q.   The attorney general also

8   posted written testimony that was submitted

9   during the hearing on her website; correct?

10   A.   I didn't see it. But if you

11   say it's there, I will take your word for

12   it.

13   Q.   Did anyone at the NYPD or the

14   City of New York direct any individuals to

15   read the written testimony?

16   MR. MARTS: Objection.

17   Form.

18   A.   Not prepared to answer.

19   Q.   Did the City of New York take

20   any action in response to information

21   collected during the Attorney General's

22   hearings?

23   MR. MARTS: Objection to form

24   and scope.

25   A.   Not prepared to answer.

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1   J. KANGANIS

2   Q.   Did NYPD open any internal

3   investigations as a result of testimony in

4   the AG hearings?

5   MR. MARTS: Objection to the

6   scope.

7   A.   Not prepared to answer.

8   Q.   Did the hearings testimony

9   influence the NYPD's response to the

10 protests in any way?

11   A.   Not prepared to answer.

12   Q.   Following the hearings, did the

13 AG publish a preliminary report on her

14 office's findings?

15   A.   Yes.

16   Q.   Was that in July 2020?

17   A.   I believe so.

18   Q.   Was anyone within the NYPD or

19 the City of New York directed to review the

20 preliminary report?

21   A.   Not prepared to answer.

22   Q.   Did the NYPD or the City of New

23 York take any action in response to the

24 information contained within the

25 preliminary report?

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                              J. KANGANIS

1

2   A.   Not prepared to answer.

3   Q.   Specifically, did the NYPD

4   consider the recommendations contained

5   within the report?

6   A.   Not prepared to answer your

7   question.

8   Q.   What, if anything, was done in

9   response to the recommendations in the AG's

10   preliminary report?

11   A.   Again, I'm not prepared to

12   answer your question.

13   Q.   After receiving requests for

14   information from the Attorney General's

15   Office, Corporation Counsel, and DOI, did

16   the NYPD take any steps to ensure that

17   records were preserved in anticipation of

18   future litigation?

19   MR. MARTS: Objection.

20   Outside of the scope.

21   A.   Preservation notices were sent

22   out.

23   Q.   And who was responsible for

24   that?

25   MR. MARTS: Objection.

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1   J. KANGANIS

2   Outside of the scope of the

3   topics.

4   A.   Not prepared to answer.

5   Q.   When were preservation notices

6   sent out?

7   MR. MARTS: Objection.

8   Outside of the scope of the

9   topics.

10   A.   I'm not prepared to answer.

11   Q.   How were the preservation

12   notices communicated?

13   MR. MARTS: Objection.

14   Outside the scope of the

15   topics.

16   A.   I'm not prepared to answer.

17   Q.   I'm going to show you what will

18   be marked Kanganis 25. This has a Bates

19   stamp DEF_000173545 through 546.

20   (Whereupon, the aforementioned

21   document was marked as Kanganis

22   Exhibit 25 for identification as of

23   this date by the Reporter.)

24   Q.   Do you recognize this document?

25   A.   If you scroll down, I might be

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```
 1                 J. KANGANIS
 2   able to.  Yes.
 3        Q.    What is this document?
 4        A.    It is a preservation notice
 5   with my signature on it.
 6        Q.    It's dated June 22, 2020?
 7        A.    I can't see the top.  Yes.
 8        Q.    To whom was this sent?
 9        A.    The commanding officer,
10   Technical Assistance Response Unit.
11        Q.    Was a similar preservation
12   notice sent to anyone other than the
13   Technical Assistance Response Unit?
14             MR. MARTS:  Objection.
15             Outside of the scope.
16        A.    There were additional
17   preservation notices sent, but I can't tell
18   you to whom.
19        Q.    Is that because you can't
20   recall or you're not prepared to answer
21   that question?
22        A.    Well, I really can't recall the
23   destination of these memos.
24        Q.    What triggered this
25   preservation notice going out?
```

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 1                    J. KANGANIS
 2            MR. MARTS:   Objection.
 3            Outside of the scope.
 4      A.     It says, "anticipated
 5  litigation against the City and the
 6  department," so that's what triggered it.
 7      Q.     What made the department
 8  anticipate litigation?
 9            MR. MARTS:   Objection.
10            Outside of the scope of the
11       topics.
12      A.     I'm not prepared to answer.
13      Q.     Did you or anyone else in this
14  department send any other preservation
15  notices earlier during the period of the
16  protests?
17            MR. MARTS:   Objection.
18            Outside of the scope of topics.
19      A.     Not prepared to answer.
20      Q.     Did you or anyone else in the
21  department send any other preservation
22  notices after June 22, 2020 during the
23  period of the protests?
24            MR. MARTS:   Objection.
25            Outside of the scope.
```

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J. KANGANIS

1

2   A.   That was it. That was the

3   decision not only by Vance's office, but it

4   was an article regarding the other district

5   attorneys in the Bronx, Brooklyn, and

6   Queens to make their decisions. So there

7   is nothing really to respond to. Those

8   decisions were made in the prosecutor's

9   office.

10   Q.   Were you prepared at all to

11   talk about any specific decisions such as

12   the affidavit that we showed you at the

13   beginning of this deposition?

14   MR. MARTS: Objection.

15   A.   Which affidavit are you

16   referencing?

17   Q.   The affidavit in support of

18   dismissing prosecution.

19   A.   No. I have never seen that

20   document before as I told you when you

21   asked me questions about it.

22   Q.   How did you interpret the part

23   of topic 20 that references any local

24   district attorney's office?

25   A.   Again, I think you want me to

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 1                    J. KANGANIS

 2   testify to communications that did not

 3   happen.  There was no coordination

 4   regarding the decision to dismiss or not

 5   prosecute certain cases.  There was no

 6   response.

 7        Q.     Topic 20, it doesn't talk about

 8   dismissals to prosecute.

 9        A.     Continuing, if I may, I'm not

10   aware of any investigations similar to

11   that, those that were conducted by CCRB,

12   DOI, Law Department, the AG that were

13   conducted by local district attorneys.

14        Q.     So your interpretation of topic

15   20 was that it only pertained to any

16   investigation by district attorney office

17   that was similar in nature to that of the

18   investigations by the Department of

19   Investigation or the Law Department?

20             MR. MARTS:  Objection.

21             Objection to form.

22             You can answer.

23        A.     Yes.

24        Q.     Would you agree that NYPD and

25   the City of New York's response to the
```

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1   J. KANGANIS

2   reports mentioned in topic 20 would include

3   any action taken to implement

4   recommendations from those reports?

5   A.   Yes.

6   Q.   What is your basis for

7   understanding that topic 20 would only

8   encompass investigations by district

9   attorney office that were similar in nature

10   to that of the Law Department or the DOI's

11   investigations?

12   MR. MARTS: Objection to form.

13   You can answer.

14   A.   Because they all grew up

15   together. There is no mention of criminal

16   investigations by any local district

17   attorney office, district attorney, CCRB,

18   DOI into the City's responses to the summer

19   of 2020 protests.

20   Q.   Does any local district

21   attorney office in New York conduct any

22   criminal investigations?

23   A.   I'm not aware of any such

24   investigation, any local district attorney

25   office. They would have come through our

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1   J. KANGANIS

2   team. There were no such requests.

3   Q.   Does the local district

4   attorney office have any authority to

5   conduct a non-criminal investigation?

6   MR. MARTS: Objection.

7   A.   Listen, I'm not aware of the

8   Law Department conducting an investigation

9   either, and they did.

10   Q.   The Law Department was

11   specifically ordered to conduct that

12   investigation by Mayor de Blasio; right?

13   A.   Yes.

14   Q.   So they had authority to

15   conduct that investigation?

16   A.   Yes, they did.

17   Q.   In preparation for this

18   deposition, did you ever ask anyone outside

19   of your legal counsel what type of

20   investigations might be contemplated by

21   topic 20 including involving a district

22   attorney office?

23   MR. MARTS: Objection. I

24   apologize for speaking, but can you

25   clarify your question please because

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```
 1                    J. KANGANIS
 2        I'm a little confused?
 3        Q.    In the course of preparing for
 4   this deposition, did it ever occur to you
 5   that there were no investigations by any
 6   district attorney office falling under the
 7   definition of topic 20 that you thought
 8   existed?
 9              MR. MARTS:  Objection to the
10         form of the question, also asking the
11         witness to speculate.
12        A.    I don't have an answer for you
13   other than what I have already told you.
14        Q.    Is there anything that you want
15   to change or add to your testimony that was
16   given today?
17        A.    No.
18              MS. BULL:  I'm going to turn
19         over questioning to co-counsel Remy
20         Green.
21   EXAMINATION BY
22   MX. GREEN:
23        Q.    Good evening.  I think we
24   should be able to get through what I have
25   very quickly.
```

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1   J. KANGANIS

2   Just so you know, I'm one of

3   the attorneys on one of the other

4   consolidated cases. I am representing a

5   group of plaintiffs led by a plaintiff

6   named Adama Sow, A-D-A-M-A   S-O-W.

7   Within the scope of topic 21B,

8   what I would like to ask you about is how

9   the City and the NYPD reacts to

10   declinations to protect suit or decisions

11   to dismiss a prosecution. I think it

12   should be pretty simple answers.

13   Does the City ever take into

14   account declination to prosecute decisions

15   to revise its policies?

16   MR. MARTS: Objection to the

17   scope.

18   MX. GREEN: What --

19   MR. MARTS: You asked me a

20   question. I can explain. I believe

21   there is another topic that's

22   relevant to specific policies. If

23   I'm not mistaken, it's topic one.

24   MX. GREEN: But what I asked

25   about was whether the NYPD and the

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1   J. KANGANIS

2   City's response to decisions by any

3   district attorney to decline to

4   prosecute ever led to changes in

5   policy.

6   What is your argument or what

7   is your objection to that question

8   being within the scope of the NYPD

9   and the City of New York's response

10   to a decision by a district attorney

11   to decline to prosecute?

12   MR. MARTS: As I said, I

13   believe it is not a topic that

14   addresses changes in policy.

15   MX. GREEN: That is

16   nonresponsive.

17   What is your objection to being

18   within this topic?

19   MR. MARTS: I told you my

20   understanding, there is another topic

21   that potentially deals with changes

22   in policies. In my opinion, it falls

23   under that topic.

24   MX. GREEN: That's not what --

25   I mean --

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```
 1                    J. KANGANIS
 2              MR. MARTS:  I put my objection
 3         on the record.
 4              MX. GREEN:  I think it's a
 5         bad-faith objection.
 6              MR. MARTS:  If that's what you
 7         think, by all means.
 8              MX. GREEN:  I think it's
 9         nonsensical, but fine.
10         Q.    Deputy Inspector, please answer
11    the question.
12         A.    Can you repeat the question?
13         Q.    Is it your understanding that
14    the City of New York does not take into
15    account declination to prosecute decisions
16    in revising NYPD policy?
17         A.    No.
18         Q.    Sorry, maybe it's because I
19    asked it in a double negative way.
20              Is that no to say that the City
21    does not take those into account?
22         A.    We have a Risk Management
23    Bureau does analysis of, you know, declines
24    to prosecute.
25              And if we see an issue that
```

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1   J. KANGANIS

2   needs to be addressed, we might address it

3   in training or something like that.

4   Q.   Did the Risk Management Bureau

5   take into account at any point any of the

6   declination to prosecute decisions during

7   the summer 2020 protests?

8   A.   Not prepared to answer.

9   Q.   You're not prepared to answer

10   whether the NYPD and the City of New York

11   response to declination to prosecute

12   decisions during summer 2020 protests

13   involved a consideration by the Risk

14   Management Bureau?

15   MR. MARTS: Asked and answered.

16   A.   Right.

17   Q.   Did any agency or other

18   decision-making body outside of the Risk

19   Management Bureau take into account

20   declination to prosecute decisions during

21   the summer of 2020 in evaluating NYPD

22   policy?

23   A.   Not prepared to answer.

24   Q.   Did your preparation at any

25   point during this involve speaking to

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```
1                    J. KANGANIS
2    anyone at the Risk Management Bureau?
3         A.    No.
4              MX. GREEN:  I have nothing
5       further.
6              MR. MARTS:  Do you have any
7       follow-up questions?
8              MS. BULL:  I do not.
9              MR. MARTS:  Can we take like an
10      eight-minute break?
11             MS. BULL:  So see you at 5:50?
12             MR. MARTS:  Yes.  Thank you.
13             (Whereupon, at 5:43 p.m., a
14      short recess was taken.
15             At 5:50 p.m., the deposition
16      resumed. )
17             MR. MARTS:  I just want to put
18      on the record the same objections I
19      stated at the beginning of the
20      deposition, that based on how the
21      deposition transpired, I believe it's
22      obvious that the plaintiffs did not
23      comply with the paragraph 12 of the
24      stipulation pertaining to remote
25      deposition as well as Federal Rule of
```

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```
 1                    J. KANGANIS
 2        Procedure 30.
 3             And I also reiterate the same
 4        objection as stated in the beginning
 5        of the deposition pertaining to
 6        certain questions that were asked,
 7        questions that were outside the
 8        topics 20 and 21 the witness was
 9        designated to testify to.
10             And I just want to reiterate
11        the position it's the defendant's
12        position that the answers to those
13        questions are not binding on the
14        City.
15             MS. BULL:  We want to state for
16        the record that we will hold these
17        topics open because of the pervasive
18        lack of preparation that Deputy
19        Inspector Kanganis had for the topics
20        20 and 21 for which the witness was
21        designated to testify to.
22             MR. MARTS:  Obviously, just for
23        the record, we disagree with the
24        objection.
25             MS. BULL:  And we disagree with
```

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```
 1                    J. KANGANIS

 2        your objections.

 3             MR. MARTS:  I can see that.

 4             MS. BULL:  Thank you very much

 5        for your time.

 6             MR. MARTS:  I would ask that

 7        the copy of the transcript be made

 8        available.

 9             MS. BULL:  Yeah, it will be.

10             (Whereupon, at 5:45 p.m., the

11        Examination of this witness was

12        concluded.)

13

14             °         °         °         °

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1   J. KANGANIS

2   D E C L A R A T I O N

3

4   I hereby certify that having been

5   first duly sworn to testify to the truth, I

6   gave the above testimony.

7

8   I FURTHER CERTIFY that the foregoing

9   transcript is a true and correct transcript

10   of the testimony given by me at the time

11   and place specified hereinbefore.

12

13

14

                    _____

15   JOHN KANGANIS

16

17

18   Subscribed and sworn to before me

19   this _____ day of _____ 20___.

20

21

      _____

22   NOTARY PUBLIC

23

24

25

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```
1                    J. KANGANIS
2                  ERRATA SHEET
          VERITEXT/NEW YORK REPORTING, LLC
3
    CASE NAME:  People of the State of New
4   York, by Letitia James, Attorney General of
    the Sate of New York vs City of New York et
5   al
6   DATE OF DEPOSITION: April 6, 2023
    WITNESS' NAME: John Kanganis
7
    PAGE/LINE(s)/     CHANGE          REASON
8
    ____/_____/_____/_____
9   ____/_____/_____/_____
    ____/_____/_____/_____
10  ____/_____/_____/_____
    ____/_____/_____/_____
11  ____/_____/_____/_____
    ____/_____/_____/_____
12  ____/_____/_____/_____
    ____/_____/_____/_____
13  ____/_____/_____/_____
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14  ____/_____/_____/_____
    ____/_____/_____/_____
15  ____/_____/_____/_____
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16  ____/_____/_____/_____
    ____/_____/_____/_____
17  ____/_____/_____/_____
    ____/_____/_____/_____
18  ____/_____/_____/_____
    ____/_____/_____/_____
19  ____/_____/_____/_____
    ____/_____/_____/_____
20
21                  _____
                        John Kanganis
22  Subscribed and Sworn To
    Before Me This_____Day
23  Of_____, 20  .
24          _____
                Notary Public
25
```

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                                                      Page 319
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```
 1                        J. KANGANIS

 2                         I N D E X

 3    EXAMINATION BY                          PAGE

 4    MS. BULL                                  5

 5    MX. GREEN                               309

 6

 7

 8

 9                    E X H I B I T S

10    KANGANIS EXHIBITS:

11    EXHIBIT            EXHIBIT

12    NUMBER             DESCRIPTION                PAGE

13    Exhibit 1          2.2022 Consolidated Notice    17

14           of Deposition

15    Exhibit 2          GB email to counsel with      25

16           exhibits

17    Exhibit 3          Documents Bates stamped        45

18           DEF_00323038 through 054

19    Exhibit 4          Documents Bates stamped        64

20           DEF-000323140 through 142

21    Exhibit 5          Documents Bates stamped        71

22           DEF-_PD_00000995 through 998

23    Exhibit 6          Documents Bate stamped         89

24           DEF_000031229 through 230

25    (Continued on next page.)
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 2   (Continued)   E X H I B I T S

 3

 4   KANGANIS EXHIBITS:

 5   EXHIBIT              EXHIBIT

 6   NUMBER               DESCRIPTION              PAGE

 7   Exhibit 7            Documents Bate stamped    99

 8            DEF_E_PD_00097604 through

 9            605

10   Exhibit 8            Documents Bate stamped   106

11            DEF_000267108 through 111

12   Exhibit 9            Documents Bate stamped   113

13            DEF_00073350 through 353

14   Exhibit 10           NYC Charter Section 440  119

15   Exhibit 11           CCRB NYPD MOU on BWC     124

16            11/21/19

17   Exhibit 12           Documents Bates stamped  145

18            DEF_000175466 through 468

19   Exhibit 13           Documents Bates stamped  155

20            OAG-0406960 through 7549

21   Exhibit 14           CCRB Memorandum 7/15/19  192

22   Exhibit 15           Documents Bates stamps   197

23            DEF-E_000009673 through

24            975

25   (Continued on next page.)
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 1                  J. KANGANIS

 2   (Continued)   E X H I B I T S

 3

 4   KANGANIS EXHIBITS:

 5   EXHIBIT             EXHIBIT

 6   NUMBER             DESCRIPTION              PAGE

 7   Exhibit 16        Documents Bates stamp DEF_  206

 8             0000174334 through 335

 9   Exhibit 17        Document Bates stamp        209

10             number DEF_ 000164123

11   Exhibit 18        Documents Bates stamp       213

12             DEF_000174210 through 324

13   Exhibit 19        Documents Bates stamp       243

14             SOW001641 through 1695

15   Exhibit 20        Mass Demonstrations         250

16             Response Recommendations

17             Tracker

18   Exhibit 21        Documents Bates stamp       258

19             DEF_00004055524 and ending

20             on 543

21   Exhibit 22        Documents Bates stamp       275

22             DEF_0000405667 ending in

23             671

24   (Continued on next page.)

25
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 1              J. KANGANIS

 2   (Continued)   E X H I B I T S

 3

 4   KANGANIS EXHIBITS:

 5   EXHIBIT              EXHIBIT

 6   NUMBER               DESCRIPTION              PAGE

 7   Exhibit 23       Document Bates stamp          277

 8           DEF_000405663

 9   Exhibit 24       Documents Bates stamp         282

10           DEF_E_PD_ 00073644 through

11           645

12   Exhibit 25       Documents Bates stamp         287

13           DEF_000173545 through 546

14   Exhibit 26       3/15/23 Letter from the       297

15           Legal Aid Society to Mayor

16           Adams

17   Exhibit 27       New York Post Article         301

18           "Civilian Complaint Review

19           Board 'dumped' hundreds of

20           cases on NYPD at last

21           minute: Police sources"

22

23   Exhibits were retained by counsel.

24

25
```

1   J. KANGANIS

2   INFORMATION AND/OR DOCUMENTS REQUESTED

3   INFORMATION AND/OR DOCUMENTS   PAGE

4   Production of the confidentiality   23

5   agreement between the NYPD and DOI

6   Production of the section of the   146

7   Patrol Guide if it was in place

8   before July 1, 2020

9   Production of that confidentiality   222

10   agreement

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

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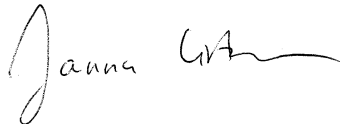
```
 1                       J. KANGANIS

 2              C E R T I F I C A T E

 3

 4   STATE OF NEW YORK        )

                              :  SS.:

 5   COUNTY OF KINGS          )

 6

 7

 8     I, JANNA LIRTSMAN, a Notary Public for

 9   and within the State of New York, do hereby

10   certify:

11     That the witness whose examination is

12   hereinbefore set forth was duly sworn and

13   that such examination is a true record of

14   the testimony given by that witness.

15     I further certify that I am not related

16   to any of the parties to this action by

17   blood or by marriage and that I am in no

18   way interested in the outcome of this

19   matter.

20     IN WITNESS WHEREOF, I have hereunto set

21   my hand this 11th day of April, 2023.

22

23

24   _____
                 JANNA LIRTSMAN

25
```

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Veritext Legal Solutions

212-267-6868   516-608-2400

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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